

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking
Regarding Broadband Infrastructure
Deployment and to Support Service
Providers in the State of California.

Rulemaking 20-09-001
(Filed September 10, 2020)

COMMENTS OF THE COUNTY OF LOS ANGELES

TABLE OF CONTENTS

I.	Introduction	3
II.	Comments on the Issues	3
a.	Issue 1: Identifying Existing Middle Mile Infrastructure	3
b.	Issue 2: Priority Areas	5
c.	Issue 3: Assessing the Affordability of Middle Mile Infrastructure	6
d.	Issue 4: Leasing Existing Infrastructure	7
e.	Issue 5: Interconnection	7
f.	Issue 6: Network Route Capacity	7
III.	References	8

I. Introduction

In accordance with Rule 6.2 of the California Public Utilities Commission (CPUC) Rules of Practice and Procedure (Rules), the County of Los Angeles (County) submits these comments in response to Order Instituting Rulemaking 20-09-001 (Rulemaking) regarding implementation of SB156, recent broadband legislation concerning the implementation of a public, open-access middle-mile network.

The County of Los Angeles is the most populous county in the State of California, with more than 10 million residents across 4,083 square miles.¹ More than one million residents live in the County's 2,638 square miles of unincorporated territory. On behalf of its residents, and its direct account, the County has a vested interest to ensure equitable broadband deployment and access for all of its residents.

II. Comments on the Issues

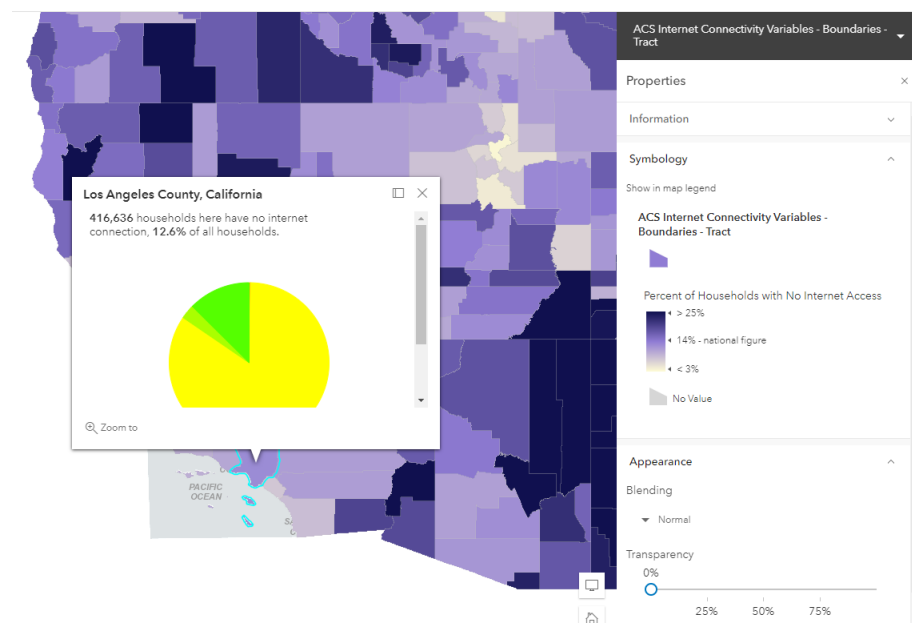
a. Issue 1: Identifying Existing Middle Mile Infrastructure

The County does not believe that there is an open-access middle-mile provider within the County boundaries, based upon the definition contained in SB 156 as “equal non-discriminatory access to eligible entities on a technology and competitively neutral basis, regardless of whether the entity is privately or publicly owned.” Terms such as “competitively neutral basis” need further definition to determine for certain if existing middle-mile solutions Los Angeles County are truly “Open Access.”

As called out in the Executive Order N-73-20², the County supports the high-speed broadband service at benchmark speeds of 100 megabits per second (Mbps). The Federal Communications Commission (FCC)’s definition of high-speed broadband as download speeds of up to 25 Mbps and upload speeds of up to 3 Mbps (25/3 Mbps) is limited and insufficient even

today, and does not meet the needs for the longer-term. Assuming all households get a minimum of 100 Mbps symmetrical service, the County doesn't have access to data on capacity from Internet Service Providers, to assess if existing broadband infrastructure has sufficient capacity. The middle mile routes need to expand beyond "Anchor Build Fiber Highways" to include dense urban areas with significant underserved communities. Granular data gathering is required at the block level to assess the required routes for middle-mile solutions. The affordability rate can be \$15/month or less based on the household income and available subsidy programs.

As per Reference 1, unserved households at 100 Mbps for the County are identified as 60,752 households (1.8%) where the number of households without internet is 416,636 (12.6%) as per American Community Survey ³ datasets shown below. The CPUC must consider data sharing among agencies, anchor institutions, and service providers to achieve accurate data impacting underserved households.



b. Issue 2: Priority Areas

It is reasonable to assume that a disproportionately high number of unserved households are in areas with insufficient middle-mile network access. However, 50% or more unserved at 100 Mbps download cannot be considered as a standard for a “disproportionately high number of unserved households.” The percentage alone may not be an accurate reflection of the disproportion. It can be a lower percentage in a dense urban area, but the absolute number of households can be very high as compared to a smaller number of households in a rural area. Also, there may be areas in which the middle mile network is present, but those areas still have a high percentage of underserved communities due to the real and documented issue of affordability. The provider does not have incentives to connect the underserved communities’ last mile needs, which leads to middle mile network needs in specific urban areas. Without middle-mile network price control, last-mile pricing cannot be subsidized perpetually.

Affordability remains the key barrier to broadband adoption, as evidenced in the CETF-USC Statewide Broadband Adoption Survey ⁴. However, the analysis must be performed on a street by street/block by block-level rather than at County/City level.

Equity and impact should be the top criteria for priority routes. For example, the County’s underserved and under-resourced areas equal about 416,636 households, which is a significant number of people being deprived of sufficient access, capacity, and speed for teleeducation, telehealth, jobs, and related essential services enabled by broadband infrastructure. Also, there is a lack of communication and trust between unserved communities and service providers which results in low enrollment even in the subsidized programs. This can be addressed by involving community-based organizations in the deployment and marketing of existing subsidized programs and ensuring community engagement.

The County has identified the priority neighborhoods within the County boundaries as high-impact areas with communities without internet access. (See table below.) These neighborhoods are identified as ones in which more than 20% of the neighborhood population does not have internet access, household income is less than \$50,000, and residents are primarily people of color. The County requests the State work closely in expanding middle mile infrastructure in the dense urban areas, beyond State routes, especially around the neighborhoods mentioned below.

1st District	2nd District	3rd District	4th District	5th District
<ul style="list-style-type: none"> • East Los Angeles • Boyle Heights/Lincoln Park • Huntington Park • El Monte/South El Monte • Bassett/West Puente Hills/Unincorporated La Puente 	<ul style="list-style-type: none"> • Compton • Lynwood • Willowbrook • Florence-Firestone • Lennox 	<ul style="list-style-type: none"> • City of San Fernando • Pacoima • Panorama City (with a small eastern portion of North Hills) • East Hollywood • High-need areas of Hollywood 	<ul style="list-style-type: none"> • Hawaiian Gardens • Paramount • Downtown Long Beach • Bellflower • South Whittier • Norwalk 	<ul style="list-style-type: none"> • Lancaster • Lake Los Angeles • High-need areas of Glendale • High-need areas of Pasadena • Duarte

c. Issue 3: Assessing the Affordability of Middle Mile Infrastructure

As a reference point, the County is paying about \$6,000/month for a 10 Gbps wavelength from one of the providers. The Commission should consider a comparison of rates for middle-mile services between providers within the same service requirements (e.g., geography and service level). Where there is less competition, the services tend to be less affordable. Based on previous experience with providers, it is not unreasonable to expect costs to increase in rural areas as there are generally greater distances and fewer constituents, which impacts the profitability and return on investment for private sector entities. The County has experienced this obstacle in many cases for services to remote areas.

d. Issue 4: Leasing Existing Infrastructure

The State may purchase Indefeasible Rights of Use (IRU) from the open-access communication infrastructure with sufficient capacity to meet the State's needs, but it requires granular and accurate data to project the current and future needs. The future capacity requirements will increase, and they need to be factored in. The State may not need to purchase IRU from the network if capacity is already available to the State within the existing network. As technology evolves rapidly, the generational investment would diminish when IRU ends 20 to 30 years later. The IRUs enable the middle mile providers to devote resources to expand their fiber network in areas where there is insufficient or no capacity.

e. Issue 5: Interconnection

The State network should connect to municipal anchor facilities in the County and in each of the 88 cities and school districts. There are multiple interconnection data centers within Los Angeles County for consideration, too. It would be reasonable and efficient to use these to connect to the various entities that provide middle-mile services instead of trying to establish separate connections to each provider. The State's middle mile network should interconnect with municipal broadband networks, to help drive local governments' cost down and to enable innovative services from the State for sustainability and the future.

f. Issue 6: Network Route Capacity

Without sufficient data forthcoming from existing internet service providers, it is difficult to estimate the capacity required to fulfill current and future needs. Generally, to ensure a sustainable future, there should be capacity to meet reasonable future growth expectations. The determination of sufficient capacity will also depend on whether existing infrastructure is used, and if so, what additional conduit was laid during those deployments. If there is net new

construction, it makes sense to add conduit, provided that there is consideration of population and potential capacity for the planned conduit.

The County welcomes partnering with the State closely in data gathering efforts for the effective planning and identification of middle mile routes.

III. References

1. Statistics, County of Los Angeles, at
<https://lacounty.gov/government/geographystatistics/statistics/> (as of July 6, 2021)
2. <https://www.gov.ca.gov/wp-content/uploads/2020/08/8.14.20-EO-N-73-20.pdf>
3. <https://lacounty.maps.arcgis.com/apps/mapviewer/index.html?layers=4f43b3bb1e274795b14e5da42dea95d5>
4. <https://assets.uscannenber.org/docs/CETF-USC Statewide Broadband Adoption Survey.pdf>.
5. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB156

Dated: September 3, 2021

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Infrastructure Deployment
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Rulemaking 20-09-001
(Filed August 6, 2021)

CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused the attached “COMMENTS OF THE COUNTY OF LOS ANGELES” to be served pursuant to the CPUC’s Rules of Practice and Procedure upon the official service list for R20-09-001, obtained from the CPUC’s website and attached hereto, by electronic mail (e-mail) to all persons with a valid e-mail address on the official service list on the official service list attached hereto.

Executed September 3, 2021 at Los Angeles, California.

By /s/ Baron Kishimoto
Baron Kishimoto



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

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FILER: CPUC
LIST NAME: LIST
LAST CHANGED: SEPTEMBER 2, 2021

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TOP OF PAGE

BACK TO INDEX OF SERVICE LISTS